

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CF 135 FLAT LLC, CF 135 WEST MEMBERS
LLC, and THE CHETRIT GROUP, LLC,

Interpleader Plaintiffs,

-against-

TRIADOU SPV S.A. and CITY OF ALMATY, a
foreign city,

Interpleader Defendants.

No. 15-CV-05345(AJN)

CITY OF ALMATY, KAZAKHSTAN and BTA
BANK JSC,

Crossclaim Plaintiffs,

-against-

MUKHTAR ABLYAZOV, VIKTOR
KHRAPUNOV, ILYAS KHRAPUNOV, and
TRIADOU SPV S.A.,

Crossclaim Defendants.

**CROSSCLAIM DEFENDANTS VIKTOR AND ILYAS KHRAPUNOV'S INITIAL
DISCLOSURES PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

Crossclaim Defendants Viktor and Ilyas Khrapunov (the “Khrapunovs”), by their undersigned attorneys, Hoguet Newman Regal & Kenney, LLP, make the following disclosures under Rule 26(a)(1) of the Federal Rules of Civil Procedure.

Preliminary Statement

These disclosures are made without waiver of, or prejudice to, any objections that the Khrapunovs may have to the production of documents or testimony. The Khrapunovs expressly reserve all such objections including, but not limited to, objections based on (a) relevance, (b)

privilege, including, but not limited to, attorney-client privilege and work product protection, (c) undue burden, and (d) overbreadth. The Khrapunovs also reserve the right to object to the admissibility in evidence of these disclosures and/or the subject matter thereof. The Khrapunovs reserve the right to amend and/or supplement these disclosures should further information become available to it after the date of these disclosures, including, but not limited to, information obtained through discovery in this action, through further investigation by counsel for the Khrapunovs, or from other sources. The Khrapunovs reserve their right to assert a defense based on lack of personal jurisdiction, and they do not intend to waive any that defense or any other by serving these disclosures.

Disclosures

A. Rule 26(a)(1)(A)(i): Individuals Likely to Have Discoverable Information that the Khrapunovs may use to Support their Claims or Defenses

The individuals presently known to the Khrapunovs who are likely to have discoverable information that the Khrapunovs may use to support their defenses (except solely for impeachment) are:

<u>Name</u>	<u>Subject</u>	<u>Address/Telephone Number</u>
Viktor Khrapunov	His alleged involvement (or lack thereof) in the predicate acts and conspiracy alleged in the crossclaims; his tenure as Mayor of Almaty and his roles in various levels of the Kazakh government; his departure from the Kazakhstan government and Kazakhstan itself; the role of the President in Kazakhstan; the investigations launched by the Government of Kazakhstan against him and his family.	c/o counsel: John J. Kenney John P. Curley Hoguet Newman Regal & Kenney, LLP 10 E. 40th Street New York, NY 10016 (212) 689-8808
Ilyas Khrapunov	His alleged involvement (or lack thereof) in the predicate acts and conspiracy alleged in the crossclaims; the role of the President in Kazakhstan; the investigations launched by the Government of Kazakhstan against him and his family.	Above

Leila Khrapunova	Her alleged involvement (or lack thereof) in the predicate acts and conspiracy alleged in the crossclaims; the role of the President in Kazakhstan; the investigations launched by the Government of Kazakhstan against her and her family.	Above
Mukhtar Ablyazov	His alleged involvement (or lack thereof) in the predicate acts and conspiracy alleged in the crossclaims; the role of the President in Kazakhstan; the investigations launched by the Government of Kazakhstan.	c/o Mr. Ablyazov's counsel.
Nicholas Bourg	Allegations in the crossclaims regarding the Swiss Development Group ("SDG") and Triadou SPV S.A. ("Triadou").	Address unknown.
Kevin Meyer	SDG and Triadou.	Address unknown.
Philippe Glatz	Allegations in the crossclaims regarding SDG and Triadou.	c/o Triadou's counsel.
Cesare Cerrito	SDG and Triadou.	c/o Triadou's counsel.
Jean-Francois Garneau	SDG.	c/o Triadou's counsel.
Gennady Petelin	Real estate investments.	Address unknown.
Elena Petelina	Real estate investments.	Address unknown.
Joseph Chetrit	Allegations in the crossclaims regarding real estate investments.	Address unknown.

Meyer Chetrit

Allegations in the crossclaims regarding real estate investments. Address unknown

B. Rule 26(a)(1)(A)(ii): Documents Within the Possession, Custody, or Control of the Khrapunovs that they may Use to Support Their Defenses

The Khrapunovs identify the following documents, electronically stored information, and tangible things currently in their possession, custody, or control that they may use to support their claims or defenses, unless the use would be solely for impeachment. Documents that are available include, but are not necessarily limited to, the following.

1. Documents related to the investigations launched by the Government of Kazakhstan against the Khrapunov family. These materials are located in the e-mail accounts, computer files, and/or hard copy files of the Khrapunovs.

2. Documents related to legal proceedings against certain Kazakh entities initiated in Switzerland by members of the Khrapunov family. These materials are located in the e-mail accounts, computer files, and/or hard copy files of the Khrapunovs.

3. Documents related to the Khrapunovs' lack of involvement in the predicate acts and conspiracy alleged in the crossclaims. These materials are located in the e-mail accounts, computer files, and/or hard copy files of the Khrapunovs and/or in the possession of Credit Suisse (Geneva), Julius Baer (Geneva), and/or Schroeder & Co. (Geneva).

4. Documents related to the sale of SDG. These materials are located in the e-mail accounts, computer files, and/or hard copy files of the Khrapunovs.

The Khrapunovs' investigation into their claims and defenses is ongoing and, therefore, they reserve all rights to supplement or amend this disclosure pursuant to Rule 26(e) and to use additional documents and information as discovery and investigation proceeds. The Khrapunovs

further reserve the right to supplement or modify this disclosure based on information or documents subsequently identified as pertinent to disputed facts. By disclosing the above categories of documents, the Khrapunovs do not waive any objections that they have or may have to producing such documents, including, but not limited to, objections based on relevance, burden, confidentiality, the attorney-client privilege, and the attorney work product doctrine.

The Khrapunovs will produce documents as required by the Federal Rules of Civil Procedure and the Court's orders. Moreover, some documents identified above may be confidential, proprietary or otherwise protected. The Khrapunovs will make such documents available for inspection and copying only subject to a suitable protective order.

C. Rule 26(a)(1)(A)(iii): Computation of Damages

The Khrapunovs do not presently seek damages, but they reserve their right to do so in the future.

D. Rule 26(a)(1)(A)(iv): Insurance Agreements

We are not presently aware any of any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Dated: August 12, 2016

**HOGUET NEWMAN
REGAL & KENNEY, LLP**

/s/ John J. Kenney
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10 East 40th Street, 35th Floor
New York, NY 10016
Phone: 212-689-8808

Counsel for Viktor and Ilyas Khrapunov

AFFIRMATION OF SERVICE

STATE OF NEW YORK }
 } ss.:
COUNTY OF NEW YORK }

JOHN P. CURLEY, an attorney, affirms under penalty of perjury:

1. I am a member of the bar of the State of New York, duly admitted to practice before this Court, and am an attorney at Hoguet Newman Regal & Kenney, LLP, counsel for Crossclaim Defendants Viktor and Ilyas Khrapunov.

2. On August 12, 2016, I served a true copy of the annexed Initial Disclosures by electronic mail to the persons named below at the address indicated:

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Dated: New York, New York
August 12, 2016

_____/s/ John P. Curley
JOHN P. CURLEY